

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Enhance  
the Role of Demand Response in Meeting  
the State's Resource Planning Needs and  
Operational Requirements.

Rulemaking 13-09-011  
(Filed September 19, 2013)

**REPLY COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY  
(U 39 E) ON ASSIGNED COMMISSIONER AND ADMINISTRATIVE  
LAW JUDGE'S RULING PROVIDING GUIDANCE FOR SUBMITTING  
DEMAND RESPONSE PROGRAM PROPOSALS**

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**I. INTRODUCTION**

Pursuant to *Assigned Commissioner and ALJ Ruling Providing Guidance for Submitting Demand Response (DR) Program Proposals* (Ruling), dated January 31, 2014, Pacific Gas and Electric Company (PG&E) provides its reply to the opening comments of parties to the guidance in the Ruling.<sup>1/</sup>

The California Public Utilities Commission (Commission) Decision (D.) 14-01-004 approved two years of bridge funding for the investor-owned utility (IOU) demand response (DR) programs in 2015 and 2016, while encouraging parties to submit proposals on program revisions for 2015 and 2016 to improve their success. PG&E supports the Commission's intent to improve DR program reliability and effectiveness and commends its guidance that "revisions shall be implementable within 90 days and must be completely implemented no later than December 31, 2014"<sup>2/</sup> to minimize disruption to the programs. With this governing principle,

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1/ Opening comments were filed by Olivine, Inc., Office of Ratepayer Advocates, Marin Clean Energy, California Energy Storage Alliance, Southern California Regional Energy Network and the Bay Area Regional Energy Network, EnerNOC, Inc., Johnson Controls, Inc., and Comverge, Inc., San Diego Gas & Electric Company, Southern California Edison Company and PG&E. EnergyHUB and Alarm.com were granted permission to late file their comments by ALJ Hymes in a ruling issued March 10, 2014.

2/ Ruling, p. 3.

PG&E addresses parties' recommendations on potential program and process improvements, new program proposals, and responses to the questions posed in the Ruling (pp.4-5).

## **II. DISCUSSION**

### **A. PG&E Supports A Phased Evolution Of DR In The Residential Sector And Is Continuously Demonstrating Its Support For A Robust Third Party Market**

Several parties' comments have indicated that they would like residential customers to have a wider array of DR programs and/or providers from which they can choose to participate. PG&E supports this principle in concept, but the proposed changes are not consistent with the guidance contained in the Ruling. These changes should instead be considered for the next IOU program application due on November 30, 2015.

In their Opening Comments, Alarm.com and EnergyHub (EnergyHub) suggest that platform and service providers receive incentives for the ongoing capability to manage devices, event participation, verification, and settlement; that more consumer technologies be incorporated in DR programs and pilots; and that existing programs such as the Capacity Bidding Program (CBP) be opened to residential customers.<sup>3/</sup> Among other comments, Marin Clean Energy (MCE) also expressed its desire to participate in the provision of DR products and programs.<sup>4/</sup> Similarly, the Southern California Regional Energy Network (SoCalREN) proposes that, under R.13-09-011, the RENs be provided funding to provide technical and project implementation assistance services in support of DR programs and technologies. SoCalRen specifically requests funding from SCE's DR budget to implement such a program within SoCalRen. (SoCalREN comments, pp 2-3.). SoCalREN points to the energy efficiency programs in regional territories that are created and administered by RENs, as a precedent.

The request by SoCalREN, however, is out of scope. The DR decision that authorized the IOUs to come in and ask for bridge funding for DR did not provide any authority for third

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3/ Alarm.com and EnergyHub Comments, pp.5-8.

4/ MCE Comments, p.2.

parties to request to independently administer DR funds. Given the challenge with supporting a large volume of customers and the short timeframe in which the proposed program changes or new pilots have to be implemented, PG&E believes that the REN proposals do not belong in Phase 1, may be more appropriate for the post-2016 DR Programs and Budget Application, which has been rescheduled to November 30, 2015.<sup>5/</sup> To gain experience in the meantime, SoCalRen can serve as an aggregator under contract in such IOU programs as the Base Interruptible Program (BIP) and CBP. DR aggregators currently provide the services SoCalREN and BayRen seem to be suggesting they can provide.

PG&E describes its positions below.

**1. CBP May Be A Viable Future Option For Residential Customer Aggregation; However, The Timeframe Provided By The Ruling Precludes Implementation During The 2015-2016 Bridge Period**

EnergyHub believes that residential customers should be eligible to participate in CBP. PG&E is supportive of this proposal in concept, but it is not consistent with the guidance provided in the Ruling due to time and resources that would be required to implement it. While CBP might be a viable option for aggregating residential customer load in the future, there are significant challenges that need to be addressed and resolved before the program can be opened to residential customers. For example, PG&E needs to receive customer authorization prior to releasing customer-specific data to third parties. The implementation of Customer Data Access (CDA) per D.13-09-025 will streamline the process whereby the customer provides its authorization for PG&E to release its data to a registered third party. Based on the project schedule, PG&E expects to complete and launch CDA Phase 1 in Q1 2015. In addition, while SmartMeter<sup>TM</sup> data are currently being used for DR settlement in CBP, additional system upgrades will be needed to reliably support the volumes associated with residential participation. Additional upgrades will be needed for other infrastructure and systems as well.

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5/ D.14-01-004, p. 8.

Given the challenges described above and the Ruling’s guidance that revisions must implementable within 90 days and must be completely implemented no later than December 31, 2014, PG&E proposes to continue to explore including residential customers in CBP but would not implement such changes until they are addressed and resolved in the post-2016 DR Programs and Budget Application.

## **2. PG&E Supports Technology Enablement For All Its Customers**

EnergyHub provided examples of program designs, including Austin Energy’s per-device incentive payment to vendors and Southern California Edison’s “Bring Your Own Thermostat” program, as models for programs as California transitions to a “bifurcated” market structure.<sup>6/</sup> However, Olivine, Inc., who has a direct experience with the utilities’ DR programs and the wholesale market, describes in its Response, there are significant challenges and barriers that must be resolved first.<sup>7/</sup> In the meantime, there are elements to the recommendations such as providing load management devices to residential customers that PG&E is already exploring, as discussed below.

PG&E also provides enabling technologies to its commercial, industrial, and agricultural customers through the Automated Demand Response (AutoDR) program. More recently, PG&E has been developing an integrated demand-side management offering for residential customers. This offering would combine energy efficiency and DR incentives for residential customers who purchase a qualifying thermostat device. The target start date of this effort is the third quarter of 2014. In order to obtain the DR portion of the incentive, the customer will need to be enrolled or agree to enroll in the SmartRate™ Program and agree to receive a DR signal that will reduce customer HVAC energy use during SmartRate™ events.

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6/ EnergyHub Comments, Attachment A.

7/ Olivine Comments, pp.1-4.

In order for this new incentive program to be successful, PG&E will require the thermostat platform providers to receive an OpenADR<sup>8/</sup> 2.0 signal from PG&E's Demand Response Automated Server (DRAS). In turn, the platform provider will send a signal to the participating thermostats during DR events which will reduce the energy consumed by the HVAC device. There is currently not enough information to determine if the incentive level provided by Austin Energy (i.e., \$25 for customer enrollment and a \$15 per year per customer incentive to the platform provider) is applicable for participation in SmartRate™ via these thermostats; however, PG&E will be working with the qualified thermostat platform providers to explore different payment options beginning in the second quarter of 2014.

### **3. PG&E's Proposed Pilots Are Sufficient**

As noted above, PG&E recognizes that there are challenges to implementing residential customer participation in programs like CBP. And PG&E understands that parties like EnergyHUB are interested in pilots for mass market participation in DR.<sup>9/</sup> PG&E's proposed pilots for the bridge years 2015-2016 will investigate this issue, on a limited basis.

PG&E's pilot request, Supply Side DR Pilot (formerly known as Intermittent Resource Management Pilot 2), will include the inclusion of a limited number of residential customers that are eligible to participate. The Supply Side DR Pilot, as proposed, will provide a mechanism that would allow for technology-service providers like EnergyHub to offer their load reduction, off of produced by aggregated residential and mass market customers, to the CAISO's energy market. PG&E believes that the Supply Side DR Pilot will be a key transitional tool that can provide better information, education and experience to all interested parties that have aspirations of interacting with the CAISO wholesale market.

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8/ As defined by the OpenADR Alliance, OpenADR is an open and interoperable information exchange model and emerging Smart Grid standard. OpenADR standardizes the message format used for Auto-DR so that dynamic price and reliability signals can be delivered in a uniform and interoperable fashion among utilities, ISOs, and energy management and control systems. While previously deployed Auto-DR systems are automated, they are not standardized or interoperable. Additional information may be found at [www.openadr.org](http://www.openadr.org).

9/ EnergyHub comments, Section IV.

#### **4. Marketing, Education, And Outreach (ME&O) For Dynamic Pricing Are Outside The Scope Of This Proceeding**

The Commission's Guidance<sup>10/</sup> to the IOUs and subsequent Scoping Memo<sup>11/</sup> for the 2012-2014 DR Application excluded requests for costs attributed to Dynamic Pricing. In accordance with this Guidance and Scoping Memo, the only Dynamic Pricing related costs included in PG&E's 2012-2014 DR Application were for costs, e.g., M&E and notifications, that had not been covered in other proceedings.<sup>12//</sup> Nonetheless, the Office of Ratepayer Advocates (ORA) comments recommend targeting the marketing of SmartRate<sup>TM</sup> to only warm climate zones and focusing the education and outreach on residential Time-of-Use (TOU) rates (which is not the same as SmartRate). While this ORA recommendation is out of scope for this proceeding, PG&E would like to address ORA's assertions pages 16-20 of ORA's comments.

PG&E notes that it does in fact conduct target marketing for SmartRate<sup>TM</sup>. PG&E does so by identifying and targeting customers who show a high propensity to engage in the program and provide load reductions during event days. This approach optimizes PG&E's outreach spending and maximizes the aggregate impact of the program. PG&E conducts targeted marketing within the Greater Bay Area because many locations within this geography, such as Livermore and Concord, experience high temperatures and have customers that produce consistent and meaningful load impacts. The April 1, 2014 annual DR load impact evaluation will clearly indicate that PG&E's strategy of targeting high use customers and marketing SmartRate to SmartAC customers in order to increase impacts has been effective.<sup>13/</sup>

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10/ ALJ Ruling Providing Guidance for the 2012-2014 Demand Response Applications states that the proceeding's focus is price responsive demand response, not dynamic rates. Furthermore, Footnote 5 states "The authority to develop and recover costs associated with dynamic rates will be addressed in other proceedings." p.5 (Aug. 27, 2010).

11/ Joint Assigned Commissioner and ALJ Ruling and Scoping Memo, Footnote 6, p. 7 (May 13, 2011).

12/ PG&E submits annual load impact reports annually on or around April 1 pursuant to D.08-04-050.

13/ PG&E submits annual load impact reports annually on or around April 1 pursuant to D.08-04-050.



## **B. ORA's Proposal To Revise The BIP Trigger Is Unnecessary**

In its Opening Comments, ORA proposes to revise the BIP trigger to provide the California Independent System Operator (CAISO) the option of calling a BIP event before procuring Exceptional Dispatch capacity for Capacity Procurement Mechanism (CPM) purposes.<sup>14/</sup> This would involve, as ORA describes it, moving the dispatch of the BIP to an earlier step in the CAISO's Operating Procedure 4420, section 3.3.2. ORA claims that this would avoid the need to procure capacity from non-Resource Adequacy (RA) resources, and avoid procuring the same capacity twice – once for the BIP and once for the Exceptional Dispatch - CPM.<sup>15/</sup> First, PG&E notes that any revisions to the CAISO's Operating Procedures should be addressed in a CAISO stakeholder process. In addition, PG&E respectfully disagrees with ORA's suggestion for the reasons described below.

ORA's proposal to revise the CAISO's dispatch trigger for Interruptible Load programs is unnecessary because the CAISO already has the ability to dispatch the BIP at any step of the sequence under section 3.3.2 of Operating Procedure 4420 which governs the sequence of steps the CAISO will typically take once it issues a Warning Notice. However, the CAISO retains the right to take the listed steps in any order it considers necessary. Section 3.3.2 states, "The CAISO System Operator may take, but is not limited to, the following actions in any order needed, and to the extent necessary, to prevent, mitigate or otherwise manage a System Emergency." (CAISO Operating Procedure 4420, p.6.) Therefore, the CAISO is not limited to calling the BIP solely in the sequence of steps listed in section 3.3.2 which renders moot ORA's proposal to move the dispatch of the BIP to an earlier step. Even when a Warning Notice has not been issued, PG&E's E-BIP rate schedule governing the BIP, expressly states that the CAISO can request that PG&E dispatch the BIP "based on its forecasted system conditions and operating procedures...or in the event of a transmission system emergency."<sup>16/</sup>

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14/ ORA, pp.9-16.

15/ *Ibid*, p. 10.

16/ [http://www.pge.com/tariffs/tm2/pdf/ELEC\\_SCHS\\_E-BIP.pdf](http://www.pge.com/tariffs/tm2/pdf/ELEC_SCHS_E-BIP.pdf), Sheet 7.

ORA's contention that the BIP could have been used as an alternative to Exceptional Dispatch – CPM procurement is speculative and untested. ORA provided a list Exceptional Dispatch – CPM events since 2011 with the date of the event, a very general characterization of the event and ORA's opinion about whether BIP may have been an alternative to non-RA CPM. However, ORA provides no explanation of the circumstances of each Exceptional Dispatch-CPM event or explanation why the BIP would have been a good resource to use instead. As explained above, if the CAISO believed that the BIP was capable of meeting the reliability needs addressed by the Exceptional Dispatch-CPM events, it had the prerogative to request it. Given that the September 8, 2011 Exceptional Dispatch was for 22 days and the February 22, 2013 exceptional Dispatch was for two months, it is unclear how the BIP could have met the associated reliability needs. As a use-limited resource, its monthly energy limits would likely have been quickly reached. The rest of the Exceptional Dispatches cited were either voltage support issues or events outside of PG&E's service area.

### **C. There Are Sufficient Funds For The Permanent Load Shifting (PLS) Program**

The California Energy Storage Alliance (CESA) asserts that (1) the PLS program must be extended through 2020; (2) measurement and verification (M&V) requirements during the feasibility study and during /after project implementation must be eased; (3) incentive payment structure should mirror SGIP; and (4) the conversion factor calculations for existing buildings must be eased.<sup>17/</sup> First, the scope of this Ruling is to address the 2015-2016 bridge period; therefore, CESA's proposed extension of new PLS through 2020 is outside the scope of this proceeding. In addition, any such extension needs to be aligned with the future needs of the grid and how DR programs will address those needs; all of which are the topic of the current Rulemaking 13-09-011. Second, as PG&E previously explained<sup>18/</sup>, PG&E has made no incentive payments for new PLS projects under the authorization in D.12-04-045, since the

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17/ CESA's Comments. Appendix 1

18/ PG&E's Comments, p.6.

current PLS program was approved. It has been only a few months since the revised PLS program was introduced, so changes to program requirements on M&V, incentive payment structure, and conversion factor are premature. Therefore, PG&E's request to carry over the unspent and uncommitted PLS funds for incentive payment during the 2015-2016 period is reasonable and sufficient to fund the program for the bridge year period.

**D. CESA's Statement That Increased Funding As A Result Of The GRC Partial Settlement Should Correlate With Increased Program Dispatch And That Reducing DR RRQ Without Program Reform Are Without Merit**

CESA incorrectly assumes that an increased cost recovery amount results from the GRC Partial Settlement. In fact, there is no increase in funds; rather, it is merely a change in where a portion of the DR program budget is being recovered. Instead of being recovered as part of the GRC I revenue requirement, the costs addressed in the GRC Partial Settlement will be recovered through DR funding.

Furthermore, CESA's assertions that DR programs were underutilized and that PLS is "a flexible and fully dispatchable resource"<sup>19/</sup> also are in error. The statewide PLS program provides incentive to qualified cool Thermal Energy Storage (TES) technologies. However, it remains to be determined whether TES can be utilized as a flexible and fully dispatchable resource. PG&E recommends continuing the existing PLS program as an On-peak load shifting program based on the original program proposal approved by CPUC in 2013. PG&E does agree with CESA that the value of two-way flexibility should be explored, as PG&E's Pilot to Assess Potential for DR to Address "Excess Supply" Situations intends.

CESA supports TURN in reducing the DR budget due to its underutilization<sup>20/</sup>; however, as PG&E explained in its March 3, 2014 Opening Comments<sup>21/</sup>, there are valid reasons – delays in the issuance of the 2012-14 program cycle decision, delays in the issuance of resolutions

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19/ CESA's Comments, p.2.

20/ CESA's Comments, pp.3-4.

21/ PG&E's Comments, p. 10-11.

related to DR program advice letters, and the typical expense pattern over the course of the three-year DR program cycle – for the slow spending as the program cycle was beginning in 2012.

**E. Changes To The Reporting Requirements Should Be Thoughtful And Agreed Upon By All Parties**

ORA recommends “regular reporting requirements throughout the DR season to improve transparency and predictability of the implementation of DR programs.”<sup>22/</sup> PG&E supports the increased transparency and predictability of DR program dispatch, but cautions that some of the data that ORA is requesting<sup>23/</sup> are beyond the information that the PG&E can provide. For example, ORA is asking for “the highest cost resources that was dispatched” instead of DR. PG&E does not have this information. The dispatch of generation resources is a result of the CAISO market optimization algorithm. PG&E has no information on the conditions that require the dispatch, nor of the actual dispatch, of other generation resources. Furthermore, PG&E is unaware to what extent the CAISO takes into consideration the IOUs’ DR program dispatches in its operational load forecasts. The dispatch of DR programs does not rely on this information, but instead uses proxies such as heat rate or temperature triggers. In instances when a program is dispatched locally, these occur when a transmission or distribution emergency arises<sup>24/</sup> or by utilizing localized temperature forecasts<sup>25/</sup> as a proxy for determining potential need. Finally, new or additional reporting requirements should be developed in a manner that is open to parties’ input and is considered in the context of all other reporting requirements to ensure that the reports are meaningful, i.e., address a specific need, complete and free of redundancies.

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22/ ORA’s Comments to Ruling, pp.6-9.

23/ ORA’s Comments, p. 8.

24/ The SmartAC<sup>TM</sup> program was dispatched four times in 2013 at various local areas.

25/ PG&E’s CBP and DBP tariff uses temperature as a trigger.

**F. MCE's Assertions that Structural Constraints Hinder CCA Customer Participation in 2015-16 DR Programs and Pilots are Without Merit**

**1. MCE's allegations that DR program cost recovery and Incentive Ratemaking is Anti-competitive is Unfounded and Not Within the Scope of the January 31, 2014 ACR**

MCE alleges that current DR program cost recovery and incentive ratemaking are anti-competitive (in other words, cost recovery and incentive ratemaking give the IOUs an undue advantage). MCE's allegations, however, are not within scope of the January 31, 2014 ACR, as they do not specify program improvements for the 2015 and 2016 bridge funding period. Additionally, DR program cost recovery and allocation will be addressed in subsequent phases and decisions of this rulemaking.

At this point, however, PG&E responds to a misconception in MCE's comments. MCE argues that non-participating customers are unduly subsidizing DR program participants, but PG&E notes that whether or not that is inequitable requires other considerations. As demonstrated in PG&E's rebuttal testimony in A.11-03-001, program eligibility alone is not a basis for cost allocation of DR program revenue requirements.<sup>26/</sup> For instance, PG&E's bundled residential, small commercial, small agricultural and streetlight customers are not eligible to participate in the Base Interruptible Program, yet these customer classes contribute to fund these program incentives and program management costs through their distribution rates. This example demonstrates that MCE's position should not be accepted at face value.

**2. MCE's Allegation That PG&E Does Not Provide It With Customer Data Is Incorrect.**

MCE further accuses PG&E of not providing it with customer data.<sup>27/</sup> This is false. PG&E provides MCE with billing information for its Community Choice Aggregation (CCA) program every business day, and MCA has requested and obtained a variety of other billing information for energy efficiency programs and CCA programs pursuant to the CCA INFO tariff.

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26/ A.11-03-001, Pacific Gas and Electric Company, 2012-14 Demand Response Programs and Budgets, Rebuttal Testimony, Ex. PGE-8, July 11, 2011, p. 11-3.

27/ Ibid, p.4

(Schedule E-CCAINFO).<sup>28/</sup> However, MCE and other third parties may not obtain customer specific data without customer consent for other purposes. Furthermore, MCE has known since PG&E filed its Customer Data Access (CDA) application in 2012<sup>29/</sup> that bulk access to CDA-related data, e.g., after the fact usage data, consistent with the CCAINFO tariff would not be available until a year and a half after Commission approval of the CDA application. As PG&E has stated previously, PG&E expects to complete and launch CDA Phase 1 in Q1 2015 according to the project schedule.

Finally, MCE misrepresents the obligations that PG&E has as its Meter Data Management Agent (MDMA). It implies that PG&E must provide “access to ‘real time’ usage data and ‘two way’ communications with AMI infrastructure”<sup>30/</sup> as part of the MDMA’s responsibilities. This is incorrect. As the MDMA, PG&E is required to go through validation, estimation, and editing (VEE) of the meter data. This is not done in real-time and therefore, PG&E does not anticipate providing MCE real time usage data. With respect to access to the AMI network by 3<sup>rd</sup> party operators, this system has not previously been a design requirement. Therefore, sufficient foundational access systems, risk protections, and other operational elements are not currently available to allow for such access to the AMI system.

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28/ Electric Schedule E-CCAINFO contains procedures for CCAs like MCE to obtain to customer information for CCA program implementation and energy efficiency, as follows:

16. Customer-specific information from the current billing periods as well as prior 12 months consisting of the following billing information: meter number, service agreement number, name on agreement, service address with zip code, mailing address with zip code, telephone number, monthly kWh usage, monthly maximum demand where available, Baseline Zone, CARE participation, End Use Code (Heat Source), Service Voltage, Medical Baseline, Meter Cycle, Bill Cycle, Balanced Payment Plan and other plans, HP Load and Number of Units, monthly rate schedule for all accounts within the CCA’s territory, per request.

(Schedule E-CCAINFO, Paragraph 16.) Monthly interval data is also provided as available:

17. Customer-specific information consisting of: service agreement number, monthly interval meter data where available, and rate schedule for all accounts within the CCA’s territory, per request (provided on a cd rom/zipped file).

29/ A.12-03-002

30/ MCE’s Comments, p.4.

### III. CONCLUSION

PG&E appreciates the opportunity to reply to the parties' opening comments. PG&E respectfully requests the Commission to approve PG&E's program proposals and proposed budget for Demand Response Programs for 2015 and 2016.

Respectfully submitted,

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